

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re:

Stream TV Networks, Inc.,<sup>1</sup>

Debtor.

Chapter 11

Bky. No. 23-10763 (MDC)

In re:

Technovative Media, Inc.,

Debtor.

Chapter 11

Bky. No. 23-10764 (MDC)

(Jointly Administered)

STREAM TV NETWORKS, INC. and  
TECHNOVATIVE MEDIA, INC.,

Plaintiffs,

v.

Adv. No. 23-00057

SHADRON L. STASTNEY, SLS HOLDINGS  
VI, LLC, HAWK INVESTMENT HOLDINGS  
LIMITED, ARTHUR LEONARD ROBERT  
"BOB" MORTON, SEECUBIC, INC.,  
ALASTAIR CRAWFORD, KRZYSZTOF  
KABACINSKI, KEVIN GOLLOP, ASAF  
GOLA, JOHN DOE(S), JANE DOE(S),  
DELAWARE and OTHER LAW FIRMS  
representing and acting in concert with John  
Doe(s) and/or Jane Doe(s), INVESTMENT  
BANKS employed by John Doe(s) and/or Jane  
Doe(s), PATRIC THEUNE, and SEECUBIC  
B.V.,

Defendants.

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<sup>1</sup> The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (...4092) and Technovative Media, Inc. (...5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

**MOTION FOR A TEMPORARY RESTRAINING ORDER, PRELIMINARY  
INJUNCTION, AND PERMANENT INJUNCTION**

COME NOW, Debtors Stream TV Networks, Inc. and Technovative Media, Inc. (jointly, the “Debtors”), and hereby move the Court, pursuant to Rule 7065 of the Federal Rules of Bankruptcy Procedure, for the entry of a Temporary Restraining Order and, pending a hearing thereon, the entry of a Preliminary Injunction and a Permanent Injunction against Defendants (1) Shadron L. Stastney; (2) SLS Holdings VI, LLC; (3) Hawk Investment Holdings Limited; (4) Arthur Leonard Robert “Bob” Morton; (5) SeeCubic, Inc.; (6) Alastair Crawford; (7) Krzysztof Kabacinski; (8) Kevin Gollop; (9) Asaf Gola; (10) “John Doe(s);” (11) “Jane Doe(s);” (12) Delaware and other law firms representing and acting in concert with “John Doe(s)” and/or “Jane Doe(s);” (13) investment banks employed by the Debtors or “John Doe(s)” and/or “Jane Doe(s);” (14) Patric Theune; and (15) SeeCubic B.V. (collectively, the “Defendants”). The grounds for this motion are fully set forth in the accompanying Memorandum in Support of Motion for a Temporary Restraining Order, Preliminary Injunction, and Permanent Injunction. In support of this motion, Debtors incorporate by reference the entirety of their Original Complaint and accompanying exhibits filed contemporaneously herewith, including the Declarations of Mathu Rajan and Charles M. Robertson, and rely upon the record in this case.

Dated: September 30, 2023

Respectfully submitted,

/s/ Rafael X. Zahralddin

Rafael X. Zahralddin-Aravena (PA Bar No. 71510)

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*(pro hac to be filed)*

*Counsel to the Debtors*